

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUAN ANTHONY ROBLES, (1)
aka "Juan the Man"
(Counts 1 and 4)

JOEY ALLAN MARSHALL, (2)
aka "King Joe" aka "Diesel"
(Counts 1, 3 and 4)

JARED TYLER PETERS, (3)
aka "Savage"
(Counts 1 and 3)

BRANDON WHYLEE FISHER, (4)
aka "Road Runner"
(Counts 1, 2, 3 and 4)

JOHN ALLAN SMITH, (5)
aka "Chaos"
(Counts 1 and 2)

NORMAN DALE BEACH, (6)
aka "Stormin' Norman"
(Counts 1 and 3)

MICHAEL SETH HENRY, (7)
aka "Brutal"
(Counts 1, 3 and 4)

DANIEL BRIAN HUTTEN, (8)
aka "Havok"
(Count 3)

MICHAEL LEE REESE, (9)
aka "Butcher"
(Count 3)

CASE NO.

3 : 24 cr 0051

MICHAEL J. NEWMAN

INDICTMENT

18 U.S.C. § 1959(a)(3)

18 U.S.C. § 1959(a)(6)

18 U.S.C. § 1962(d)

18 U.S.C. § 1963

MATTHEW JOHN HAWKINS, (10)	:
aka "Hawk"	:
(Count 2)	:
JOSEPH MICHAEL RADER, (11)	:
aka "Delta"	:
(Count 3)	:
JUSTIN JAMES BAKER, (12)	:
aka "Wild Boy"	:
(Count 3)	:
CODY DALE HUGHES (13)	:
aka "Tater"	:
(Count 3)	:
BRENT ALLEN EGLESTON (14)	:
aka "Be Easy"	:
(Count 4)	:
Defendants.	:

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Racketeering Conspiracy)

The Enterprise

1. At all times relevant to this indictment, defendants, **JUAN ANTHONY ROBLES, JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, JOHN ALLAN SMITH, NORMAN DALE BEACH, MICHAEL SETH HENRY** and others, known and unknown to the Grand Jury, either were or are current members of the Thug Riders Motorcycle Club (hereinafter referred to as "TRMC"), a criminal organization whose members and associates engaged in, among other activities, extortion, identity fraud, and acts of violence including acts involving murder, arson, and assault.

2. At all times relevant to this indictment, the TRMC, including its leaders, members, and associates constitutes an enterprise as defined by Title 18, United States Code, Sections 1961(4) and 1959(b)(2) (hereinafter referred to as “the Enterprise”), that is, a group of individuals associated in fact, although not a legal entity, that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constitutes an ongoing organization whose members and associates functioned as a continuing unit for the common purpose of achieving the objectives of the enterprise.

3. The TRMC was founded as an “outlaw motorcycle gang” in 2003. Since 2003, the TRMC has grown into and remains a violent domestic and international outlaw motorcycle gang with chapters located throughout the United States, Canada, Australia, Morocco, the Dominican Republic, Puerto Rico, Germany, and the United Kingdom.

4. TRMC is a highly organized, all male, multi-racial criminal organization. TRMC maintains a defined, multi-level chain of command composed of individual chapters and support clubs, along with a regional and national leadership structure. Members of TRMC belong to specific chapters and answer to the officers of that chapter. The permanent leadership of each chapter consists of a President, Vice-President, Treasurer, Road Captain, Sergeant at Arms, and Enforcers. Associated support clubs contribute additional manpower or “muscle,” membership dues, and criminal proceeds generated from other illegal activities to TRMC in exchange for the prestige of being associated with TRMC and for protection from any attacks or intimidation from rival gangs.

5. TRMC’s various chapters are organized into separate regions headed by regional “bosses” who are elected by the membership of subordinate chapters located within the region. Each region, and subordinate chapters thereof, fall under the ultimate authority of

the National President who sits at the so-called “mother chapter” located in Newark, New Jersey. The National President is elected by the overall TRMC membership.

6. The TRMC Midwest Region is made up of chapters located in Ohio, Kentucky, West Virginia, Indiana, Illinois, and Missouri. Defendant **JUAN ANTHONY ROBLES** serves as the current “Boss” of the Midwest Region. Midwest Regional chapter meetings are held regularly and are referred to as “church.” Only full or so-called “patched” members are permitted to attend “church.”

7. In 2019, the TRMC established its Dayton, Ohio chapter. Defendant **JUAN ANTHONY ROBLES** was instrumental in the creation of the TRMC Dayton Chapter, and as the current Midwest Regional Boss, he continues to exercise de facto command, control, and influence over this chapter’s regular activities.

8. The TRMC maintains written by-laws which set forth the organization’s leadership structure, membership qualifications, code of conduct, code of ethics, and disciplinary rules and procedures. The TRMC requires those seeking membership to undergo a certain vetting process. This process requires candidates to initially serve as associates or so-called “hang arounds.” This phase is followed by a probation period as a so-called “prospect.” Before full membership can be granted (which is referred to as obtaining “patch” status), a favorable majority vote by the chapter’s patched members is required. Once a full patch member, members are expected to attend regular chapter meetings and mandatory events or “rides.”

9. Members and associates of the Enterprise display their so called “patch” status by wearing distinctive markings on leather or denim vests. These so-called “vestments” or “colors” reflect full club membership. Full members are authorized to wear a back patch

consisting of the TRMC emblem (i.e., a distinctive white skull) surrounded by a top “rocker” and bottom “state rocker.” These vests commonly display other symbols such as “MC” (motorcycle club) and a “One Percenter” diamond. This “One Percenter” designation stems from a 1940 proclamation issued by the then President of the American Motorcycle Association wherein he stated ninety-nine percent of persons associated with motorcycle clubs were law-abiding citizens. The “One Percenter” patch signifies that the Enterprise is a self-proclaimed “outlaw motorcycle club” made up of non-law-abiding individuals. This “One Percenter” patch is considered a badge of honor within the Enterprise. Club members commonly display additional patches and tattoos reflecting membership in the TRMC.

10. Members and associates of the TRMC are required to comply with a written code of conduct. Violations of this code can result in various disciplinary actions being taken against them to include monetary fines, seizure of property, imposition of probation, physical assaults, and/or expulsion from the TRMC.

11. Members and associates of the TRMC are expected to protect the name, reputation, and status of the gang from rival gang members and other persons. To protect the gang and enhance its reputation, members and associates are expected to use any means necessary to force respect from those who have shown disrespect, including committing acts of intimidation, threats of violence, and acts of violence. The TRMC members and associates maintain and enhance their status within the organization by participating in such violent acts.

12. The TRMC has had long-standing conflicts with other outlaw motorcycle gangs to include “the Outlaws Motorcycle Club” (hereinafter referred to as “the Outlaws MC”). Violence between these groups has been territorial and retaliatory in nature.

13. The TRMC activities routinely affect interstate and foreign commerce. The TRMC members frequently engage in interstate travel, which has involved trafficking in firearms and committing acts of violence outside the State of Ohio. Further, the criminal acts committed by the TRMC members have included acts involving murder, arson, extortion, intimidation, and assault within and outside the State of Ohio.

14. Members and associates of the TRMC are required to pay monthly dues to their local chapter, a percentage of which is thereafter forwarded to regional and national offices. Members are also subject to special assessments or taxes for specific purposes. Funds may be transferred by and between local chapter, regional, and national offices. Members who earn money from outside criminal activity are expected to contribute a portion of their criminal proceeds to the TRMC.

15. The TRMC “support clubs” are required to pay “protection money” as part of their monthly dues to their local TRMC chapter. A percentage of these monies is forwarded to regional and national offices. This “protection money” is paid in order to (1) allow the support club to operate within the TRMC’s declared geographical territory, and (2) to receive the TRMC’s physical protection in the event members of the support club are attacked or intimidated by any other rival outlaw motorcycle gang.

Enterprise Leadership

16. Defendants **JUAN ANTHONY ROBLES, JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, and JOHN ALLAN SMITH**, have each held various TRMC leadership positions. As such, each had authority to direct members of the TRMC to engage in unlawful and violent acts in furtherance of the goals and purposes of the Enterprise. Defendant **JUAN ANTHONY ROBLES** served as the

initial President of the Dayton Chapter and currently serves as the Midwest Regional Boss for the TRMC; Defendant **JOEY ALLAN MARSHALL** served as the Midwest Regional Sergeant at Arms; Defendant **JARED TYLER PETERS** served as the President of the Dayton Chapter; Defendant **BRANDON WHYLEE FISHER** served as the Sergeant at Arms of the Dayton Chapter; and Defendant **JOHN ALLAN SMITH** served as Enforcer of the Dayton Chapter.

Purposes of the Enterprise

17. The purposes of the TRMC Enterprise included, but were not limited to, the following:

- a. Promoting, protecting, and enhancing the authority, reputation, and standing of the TRMC, and its interests, through violence, actual or implied threats of violence, acts of intimidation, extortion, possession of weapons, and the cultivation and exploitation of the Enterprise's reputation for violence;
- b. Maintaining control over the TRMC territory and expanding its territory through acts of intimidation, threats, and violence against rival gangs and others;
- c. Training and mentoring new members in the activities, traditions, and culture of the TRMC;
- d. Funding the TRMC through the collection of dues and fines from members, associates, and support clubs and employing other funding methods, including illicit alcohol sales, stripper shows, and the imposition of so-called "taxes;"
- e. Encouraging and facilitating a culture of violence and lawlessness within the TRMC by bestowing special status to members who commit acts of violence for the benefit of the Enterprise;
- f. Hampering law enforcement's ability to respond to, prevent and effectively investigate the Enterprise's unlawful activities through the fabrication of alibis and narratives, and intimidation of witnesses and victims;

- g. Enforcing the authority and power of the TRMC by disciplining, intimidating and punishing members and associates who did not comply with the TRMC code of conduct and code of ethics and those who did not follow orders; and
- h. Exposing and retaliating against the Enterprise's members and associates and former members and associates who cooperate with law enforcement.

Means and Methods of the Enterprise

18. Among the means and methods by which members and associates of the TRMC Enterprise conducted and participated in the conduct of the affairs of the Enterprise, including, but were not limited to, the following:

- a. Since on or about 2019, the members and associates of the Enterprise operated a chapter in Dayton, Ohio. This chapter initially maintained a clubhouse located at 3224 Lodge Ave., Harrison Township, in Montgomery County, Ohio, and thereafter at 1424 Stanley Ave., in Dayton, Ohio. The Dayton clubhouse has served as the so-called "state capitol" for the various TRMC Chapters in Ohio.
- b. The Dayton clubhouse has served as a central meeting location for members and associates of the Enterprise. The clubhouse was the location where "church" meetings were held and dues from support clubs were collected. TRMC events and parties were also held at the clubhouse, making it the centralized location where illicit alcohol and drug sales, illegal drug usage, and stripper shows all took place.
- c. Members and associates of the Enterprise consider themselves to be a tight knit "fraternity," "family," and "brotherhood" who are prepared to support each other by engaging in acts of physical violence, assaults, shootings, and if necessary, murder to defend fellow TRMC members regardless of the cause or reason for the conflict.
- d. Members and associates of the Enterprise have engaged and continue to engage in criminal acts designed to enrich themselves, to enhance the reputation of the Enterprise, to intimidate victims and potential witnesses of their criminal activity, and to increase their status within the Enterprise and outside community. The revenue was generated by various means too include illicit alcohol and drug sales, stripper shows, social events and the collection of monthly "protection payments" from various support clubs. These monies were used to personally benefit certain club leaders' slush funds, and to defray leaders' and members'

travel and hotel expenses incurred by out-of-town events, runs and trips.

- e. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit violent acts and continue to do so, which includes acts of extortion, assault, and murder against individuals perceived to be adverse or disloyal to the Enterprise.
- f. Members and associates of the Enterprise have punished and continue to punish other Enterprise members for acting contra to established club rules. Punishable infractions include missing meetings, failing to timely pay dues, being disrespectful to other “patched” members, and failing to attend organized trips (referred to as “runs”), etc. Authorized punishments range from the imposition of monetary fines, forcing a member to return to probate status (losing “patch” status), “beat downs” (assaults), and expulsion from the club.
- g. Members and associates of the Enterprise have coordinated responses to threats and other aggressive actions initiated by rival motorcycle gangs, law enforcement, and third parties that may interfere with the Enterprise’s operation. Chapter and Regional meetings serve as forums to discuss plans, concerns, projects, objectives and strategies, to include: (i) retaliating against rival motorcycle gangs; (ii) refusing to cooperate with law enforcement in the investigation of violent acts committed by leaders, members and associates; (iii) organizing and developing agreed false stories, alibis, or statements concerning violent and/or criminal acts committed by Enterprise leaders, and associates; (iv) intimidating witnesses through the use of violent acts committed by leaders, members, and associates; and (v) collecting fees from members to pay for the legal representation of leaders, members, and associates who may be investigated or charged with committing violent and/or criminal acts on behalf of the Enterprise.
- h. Members and associates of the Enterprise regularly obtain, possess, share, and use firearms to protect the Enterprise’s territory and retaliate against rival gangs and third parties who are perceived as a threat to the Enterprise. Possession of firearms by Enterprise members is widely universal and advertised to gain “respect” and “street credibility” within and without the gang.
- i. Members and associates of the Enterprise have possessed ballistic or “bulletproof” vests and were known to wear them while engaged in illegal Enterprise activities that involved firearms.
- j. Members and associates of the Enterprise promote and celebrate the criminal conduct of the Enterprise and often use various social media

websites to advertise the widespread possession of firearms by Enterprise members and promote acts involving violence committed on behalf of the Enterprise.

- k. To perpetuate Enterprise activities and thwart law enforcement detection and interference of those illegal activities, Enterprise members and associates routinely threaten, intimidate, and retaliate against potential witnesses or law enforcement cooperators to discourage future assistance in law enforcement investigations into those illegal activities.
- l. Enterprise members often communicate with other Enterprise members and associates about Enterprise activities or plans through the use of secure “end to end” communication applications and social media.
- m. Members and associates of the Enterprise have trafficked in firearms and other dangerous weapons affecting interstate and foreign commerce to further the interests of the Enterprise. These weapons have been used and possessed in connection with assaults and attacks on rival gang members and other third parties. Leaders, members, and associates of the Enterprise have routinely possessed and transferred firearms without regard for the lawfulness of a specific member’s legal right or authority to possess firearms.
- n. Members and associates of the Enterprise have formed alliances with other so-called “One Percenter” motorcycle clubs to enhance their ability to combat rival gangs and common enemies. The Enterprise has been embroiled in a longstanding conflict with the Outlaws MC over control of geographic territory. The Enterprise has previously formed alliances with other outlaw motorcycle clubs to include: the Pagans MC, the Detroit Highwaymen MC, and the Warlocks MC.

The Racketeering Conspiracy

19. Beginning at least by on or about January 1, 2019, the exact date being unknown to the Grand Jury, and continuing thereafter until the date of this indictment, in the Southern District of Ohio, and elsewhere, defendants **JUAN ANTHONY ROBLES, JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, JOHN ALLAN SMITH, NORMAN DALE BEACH** and **MICHAEL SETH HENRY**, together with others both known and unknown to the Grand Jury, each being employed by

and associated with the TRMC, an enterprise engaged in activities which affected interstate commerce, knowingly combined, conspired, confederated and agreed with each other to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the TRMC Enterprise, through a pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), which pattern of racketeering activity consisted of:

- a. multiple acts involving:
 - i. murder, chargeable under Ohio Revised Code Sections 2903.02(A), 2903.02(B), 2923.02(A), 2923.03(A)(1), 2923.03(A)(2), and 2923.01(A);
 - ii. arson, chargeable under Ohio Revised Code Sections 2909.02(A)(2), 2909.03(A)(1), 2923.02(A), 2923.03(A)(2), and 2923.01(A);
 - iii. extortion, chargeable under Ohio Revised Code Sections 2905.11(A)(1), 2905.11(A)(2), 2905.11(A)(3), 2923.02(A), 2923.03(A)(1), 2923.03(A)(2), and 2923.01(A); and
- b. multiple acts indictable under 18 U.S.C. § 1028 (relating to fraud and related activity in connection with identification documents).

20. It was further a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

Overt Acts

21. In furtherance of the racketeering conspiracy and to achieve the illegal object thereof, the defendants and others known and unknown to the Grand Jury committed and caused to be committed the following acts, among others, in the Southern District of Ohio and elsewhere:

- a. On or about May 24, 2021, defendant **NORMAN DALE BEACH** along with other TRMC members and associates discovered “J.M.,” a former TRMC member, at the Cape Lounge, located at 5130 Brandt Pike, Huber Heights, Ohio. Prior to this encounter, “J.M.” left the TRMC without paying his required exit fee of \$1,000 and surrendering possession of his motorcycle. As such, defendant **JUAN ANTHONY ROBLES** ordered TRMC members and associates to track “J.M.” down in order to intimidate, threaten physical force, and use physical force and violence to extract his exit fee and obtain possession of his motorcycle. “J.M.” was able to flee from the Cape Lounge premises immediately upon the arrival of the TRMC members delegation.
- b. At approximately 2:00 AM on May 25, 2021, defendants **JUAN ANTHONY ROBLES, JOHN ALLAN SMITH, BRANDON WHYLEE FISHER, “A.L.C.”** and “D.D.C.,” and others both known and unknown to the Grand Jury, planned, directed and caused defendant **BRANDON WHYLEE FISHER** and “A.C.” to transport an explosive device to “J.M.’s” residence located at 7169 Lunceford Drive, Dayton, Ohio.
- c. Upon arriving at “J.M.’s” residence shortly after 2:00 AM on May 25, 2021, defendant **BRANDON WHYLEE FISHER** placed an explosive device inside the cab of “J.M.’s” parked pick-up truck which detonated causing the destruction of “J.M.’s” pick-up truck and blast damage to the adjacent 7169 Lunceford Drive residence wherein “J.M.” was then asleep in his ground floor bedroom.
- d. On or about September 26, 2021, the Enterprise maintained its Dayton Chapter clubhouse at or near 3224 Lodge Ave., Harrison Township, Montgomery County, Ohio.
- e. On or about September 26, 2021, the Enterprise’s Dayton Chapter hosted an annual event/convention which was attended by approximately 300 Enterprise members and associates hailing from various chapters located in Ohio, Connecticut, Illinois, Maryland, Massachusetts, Missouri, New Jersey, New York, North Carolina, South Carolina, Pennsylvania, Texas, and Virginia.
- f. On or about September 26, 2021, defendants **JUAN ANTHONY ROBLES, BRANDON WHYLEE FISHER** and **JOHN ALLAN SMITH**, together with Matthew John Hawkins were in attendance at Dayton’s annual event/convention.
- g. TRMC members and associates in attendance at the annual event were wearing TRMC cuts/colors, support patches, vestments, and garb, and attendees were armed with firearms, including defendants **JUAN**

ANTHONY ROBLES, BRANDON WHYLEE FISHER, and JOHN ALLAN SMITH.

- h. At the annual event held on September 26, 2021, defendants **BRANDON WHYLEE FISHER, JOHN ALLAN SMITH**, and Matthew John Hawkins together with other Enterprise members and associates whose identities are both known and unknown to the Grand Jury, tracked a Chevrolet Tahoe to the parking lot of Air City Wine, a nearby business located at 2101 Neva Drive, Dayton, Ohio. The Chevrolet Tahoe was occupied by four individuals who were not connected to the Enterprise. These four individuals had recently been denied entry into the annual event and engaged in a confrontation with TRMC members outside their clubhouse.
- i. Upon tracking the vehicle to the nearby parking lot, defendants **BRANDON WHYLEE FISHER, JOHN ALLAN SMITH**, Matthew John Hawkins and at least three other Enterprise members and associates whose identities are both known and unknown to the Grand Jury discharged over 40 live firearm rounds towards and into the Chevrolet Tahoe, which resulted in the death of "J.C.N.," the front seat passenger of the Chevrolet Tahoe who suffered a fatal gunshot wound to the back of his head.
- j. After the shooting, **JUAN ANTHONY ROBLES**, along with other TRMC members and associates fled the scene prior to the arrival of law enforcement. TRMC members along with support club members also removed items from the clubhouse, including firearms, prior to law enforcement arriving to investigate the shooting.
- k. On or about May 9, 2022, defendant **JUAN ANTHONY ROBLES** along with other known and unknown members and leaders of the TRMC Dayton Chapter dispatched a delegation of at least four TRMC support club members to the West Liberty, Logan County, Ohio residence of former TRMC member "J.L.S." for the express purpose of intimidating and threatening both "J.L.S." and his family with physical force and violence in order to force him to pay a \$1,000 exit fee and forfeit possession of his motorcycle due to his recent decision to terminate his TRMC membership.
- l. On or about April 9, 2023, defendants **JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, NORMAN DALE BEACH** together with Daniel Brian Hutten, Michael Lee Reese, Justin James Baker, Cody Dale Hughes and other Enterprise members and associates known and unknown to the Grand Jury, traveled in convoy from the Southern District of Ohio to Lexington, Kentucky. The trip was a

retaliatory attack on a rival outlaw motorcycle gang known as the Outlaws MC after Outlaw MC members were suspected in an attack on two Kentucky TRMC members.

- m. On or about April 8-9, 2023, defendant **JUAN ANTHONY ROBLES** maintained telephonic communications with defendants **JOEY ALLAN MARSHALL, JARED TYLER PETERS** and other known and unknown Enterprise members and associates affiliated with various Ohio Chapters, the Richmond, Kentucky Chapter and the National Chapter using his cellphone assigned with the number (330) 519-3241 while Ohio TRMC members prepared for and traveled from the Southern District of Ohio to Lexington, Kentucky.
- n. On or about April 9, 2023, upon arriving in Lexington, Kentucky, defendants **JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, NORMAN DALE BEACH** together with Daniel Brian Hutten, Justin James Baker, and Cody Dale Hughes along with other Enterprise members and associates, known and unknown to the Grand Jury, first rendezvoused at a Shell Gas Station located at 1951 Stanton Way, Lexington, Kentucky for the purpose of completing final plans and preparations for an armed attack on the Outlaw MC clubhouse located in Lexington, Kentucky.
- o. Thereafter, on or about April 9, 2023, defendants **JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, NORMAN DALE BEACH** together with Daniel Brian Hutten, Justin James Baker, and Cody Dale Hughes, along with other Enterprise members and associates known and unknown to the Grand Jury, departed in a convoy from said Shell Gas Station proceeding to a second rendezvous point located at or near a Marathon Gas Station at 197 N. Broadway, Lexington, Kentucky, wherein they met with Joseph Michael Rader and other members of the Enterprise's Richmond, Kentucky Chapter.
- p. Upon arriving at this second rendezvous location, defendants **JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, NORMAN DALE BEACH** together with Daniel Brian Hutten, Justin James Baker, and Cody Dale Hughes, along with other Enterprise members and associates known and unknown to the Grand Jury, received various stolen Kentucky license plates supplied by Joseph Michael Rader, and other members of the Enterprise's Richmond, Kentucky Chapter.

- q. While at this second rendezvous location, defendants **JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, and NORMAN DALE BEACH** together with Daniel Brian Hutten, Justin James Baker, and Cody Dale Hughes, along with other Enterprise members and associates known and unknown to the Grand Jury, switched their Ohio license plates with stolen Kentucky license plates prior to initiating the planned attack on the Lexington, Kentucky Outlaws MC clubhouse.
- r. Once the Ohio TRMC members switched out their Ohio license plates with the stolen Kentucky plates, defendants **JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, and NORMAN DALE BEACH** together with Daniel Brian Hutten, Justin James Baker, Cody Dale Hughes, and Joseph Michael Rader, along with other Enterprise members and associates known and unknown to the Grand Jury, departed the said second rendezvous location in an eight vehicle convoy and drove to the Outlaws MC clubhouse located at 1315 Bryan Avenue, Lexington, Kentucky.
- s. At approximately 4:56 AM on April 9, 2023, defendants **JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, and NORMAN DALE BEACH**, together with other Enterprise members and associates known and unknown to the Grand Jury, discharged at least 192 live gunfire rounds towards and into the said Outlaws MC clubhouse, which law enforcement later determined was occupied at the time of the shooting.
- t. In April 2023, the Enterprise maintained a chapter clubhouse at 88 E. Main St., Richmond, Kentucky was located approximately .5 miles from the Outlaws MC clubhouse located at 525 E. Irvine St., Richmond, Kentucky.
- u. On or about June 17, 2023, defendants **JUAN ANTHONY ROBLES, JOEY ALLAN MARSHALL, JARED TYLER PETERS, NORMAN DALE BEACH, MICHAEL SETH HENRY, and DANIEL BRIAN HUTTEN**, together with other Enterprise members and associates, entered Toby's Tavern, located at 3601 Linden Ave., Dayton, Ohio, just after 1:00 AM. Within minutes of arriving, the Enterprise members and associates were asked to leave the bar since they were wearing their TRMC cuts/colors and making staff and other patrons nervous. An Enterprise member threatened to return and shoot up the bar.

- v. As defendant **JUAN ANTHONY ROBLES** thereafter walked out of Toby's Tavern, he threw a chair across the bar causing patrons to flee the premises. Several Enterprise members then engaged in a physical altercation with bar patrons, causing one male victim, "J.P.," to suffer a broken leg and a black eye.
- w. On or about July 25, 2023, defendants **MICHAEL SETH HENRY** and **DANIEL BRIAN HUTTEN**, together with other Enterprise members and associates, were at Chris's Band Box, a bar located at 3001 E. Third Street, Dayton, Ohio. While at this bar, Enterprise members observed an Outlaw MC member sitting at the bar wearing his Outlaw MC motorcycle cuts/colors. Enterprise members confronted and physically attacked the Outlaw MC member outside the bar and stripped him of his Outlaw MC cut during the attack. Also, during the attack, **MICHAEL SETH HENRY** fired off a round in close proximity to the targeted Outlaw MC member.
- x. On or about November 18, 2023, defendant **JUAN ANTHONY ROBLES**, together with other Enterprise members and associates, returned to Toby's Tavern located at 3601 Linden Ave., Dayton, Ohio, and directly threatened a bar employee with physical harm and destruction of the business premises unless they were immediately served alcoholic beverages in contravention of the bar's posted policy against serving outlaw motorcycle gang members who displayed gang "cuts, colors or support shirts."
- y. Between April 25, 2020, and December 30, 2023, defendants **JUAN ANTHONY ROBLES**, **JOEY ALLAN MARSHALL**, **JARED TYLER PETERS** and **NORMAN DALE BEACH** caused the TRMC's support motorcycle clubs (including the Laughing Dead M.C., the King's M.C., and Eagle's Breed M.C.) to pay monthly dues or "protection payments" in cash to the leadership of the TRMC Dayton Chapter. These payments were tendered at the Enterprise's monthly so-called "church meetings" which were held the last Saturday of every month at the Dayton Chapter's clubhouse.
- z. In December 2023, the King's MC informed defendant **JUAN ANTHONY ROBLES** that the King's MC was terminating its support club relationship with the Enterprise. The Kings MC thereafter returned their TRMC support patches, paid the Enterprise its last month's dues / protection payments, and paid an exit or buyout fee. As a result of the Kings MC decision to separate from the TRMC, the TRMC lost approximately \$1,100 to \$1,500 in monthly payments.

- aa. Thereafter, defendant, **JUAN ANTHONY ROBLES**, in his capacity as the TRMC Midwest Regional Boss refused to recognize the Kings MC as an independent club and immediately started threatening retribution upon the Kings MC membership. Members of the TRMC started actively looking for Kings MC members out in public locations.
- bb. On or about the week of March 13-20, 2024, defendant **JUAN ANTHONY ROBLES** sent a Kings MC member a series of Facebook messenger communications again indicating the TRMC still had outstanding issues with the Kings MC and indicated members of the TRMC would see members of the Kings MC soon.
- cc. On March 20, 2024, at approximately 10:04 PM, defendants **JOEY ALLAN MARSHALL, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, BRENT ALLEN EGLESTON**, and other Enterprise members and associates whose identities are known and unknown to the Grand Jury, traveled in a multi-vehicle convoy to 1133 Sunset Ave., Springfield, Ohio, where the Kings' MC Springfield clubhouse is located.
- dd. Prior to traveling to the King's MC Springfield clubhouse, defendants **JOEY ALLAN MARSHALL, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, BRENT ALLEN EGLESTON**, and the other accompanying members and associates of the Enterprise, dressed themselves in black clothing and masks, and armed themselves with firearms.
- ee. Upon arriving at the King's MC Springfield clubhouse, defendants **JOEY ALLAN MARSHALL** and **BRANDON WHYLEE FISHER**, and approximately five other Enterprise members and associates, approached the front door of the clubhouse while brandishing firearms.
- ff. When a member of the Kings MC Springfield Chapter opened the clubhouse door, defendant **JOEY ALLAN MARSHALL** and **BRANDON WHYLEE FISHER** attempted to force entry into the clubhouse, whereupon a gunfight ensued between said defendants and multiple members of the Kings' MC located inside the Springfield clubhouse. This gunfight resulted in defendant **BRANDON WHYLEE FISHER** suffering two gunshot wounds to his head.
- gg. On March 21, 2024, defendant **JUAN ANTHONY ROBLES**, who then resided in Phoenix, Arizona, posted a Facebook message on his personal account stating "Flights booked... see you soon Ohio..."
- hh. On or about May 16, 2024, at approximately 8:30 PM, at least four TRMC members from the Columbus, Ohio Chapter entered the Mad

Cow Bar and Grill at 18 E. High St., London, Ohio searching for any members of the Kings MC. After entering the bar's patio area, they found two Kings MC members who they proceeded to intimidate and physically assault, in retribution for the Kings MC's decision to depart from the TRMC and the related March 20, 2024 shooting of defendant **BRANDON WHYLEE FISHER** at the front door of the Kings MC Springfield, Ohio clubhouse.

All in violation of Title 18, United States Code, Sections 1962(d).

COUNT TWO

**(Assault with a Dangerous Weapon and Assault Resulting
in Serious Bodily Injury in Aid of Racketeering)**

22. The allegations set forth in paragraphs 1 through 18 of Count One of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

23. At all times relevant to this Indictment, the TRMC including its leaders, members, and associates, constituted an enterprise as defined by Title 18, United States Code, Section 1959(b)(2), that is a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose leaders, members, and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

24. The above described TRMC Enterprise, through its leaders, members, and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is acts involving arson and extortion in violation of the laws of the State of Ohio.

25. On or about September 26, 2021, in the Southern District of Ohio and elsewhere, defendants **MATTHEW JOHN HAWKINS**, **BRANDON WHYLEE FISHER** and **JOHN ALLAN SMITH**, together with others both known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the TRMC, an enterprise

engaged in racketeering activity, did knowingly and unlawfully assault with a dangerous weapon, and did aid and abet in the assault using a dangerous weapon, of J.C.N., and did knowingly and unlawfully assault “J.C.N.” resulting in serious bodily injury to “J.C.N.,” and did aid and abet in the assault of “J.C.N. ” resulting in serious bodily injury to “J.C.N.,” in violation of Ohio Revised Code Sections 2903.11(A)(1), 2903.11(A)(2), and 2923.03(A)(2).

All in violation of Title 18, United States Code, Sections 1959(a)(3) and (2).

COUNT THREE
(VCAR Conspiracy to Commit Assault with a Dangerous Weapon)

26. The allegations set forth in paragraphs 1 through 18 of Count One of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

27. At all times relevant to this Indictment, the TRMC including its leaders, members, and associates, constituted an enterprise as defined by Title 18, United States Code, Section 1959(b)(2), that is a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose leaders, members, and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

28. The above-described TRMC Enterprise, through its leaders, members, and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving murder, arson, and extortion in violations of the laws of the State of Ohio.

29. On or about April 9, 2023, in the Southern District of Ohio, the Eastern District of Kentucky and elsewhere, defendants **JOEY ALLAN MARSHALL, JARED TYLER PETERS, BRANDON WHYLEE FISHER, JUSTIN JAMES BAKER, CODY DALE HUGHES, MICHAEL SETH HENRY, NORMAN DALE BEACH, DANIEL BRIAN**

HUTTEN, MICHAEL LEE REESE and JOSEPH MICHAEL RADER, together with others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the TRMC, an enterprise engaged in racketeering activity, did conspire, to assault with a dangerous weapon members of the Outlaws MC, in violation of Kentucky Revised Statutes Section 508.020(1)(b) and 506.040.

All in violation of Title 18, United States Code, Section 1959(a)(6).

COUNT FOUR

(Attempted Assault with a Dangerous Weapon in Aid of Racketeering Activity)

30. The allegations set forth in paragraphs 1 through 18 of Count One of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

31. At all times relevant to this Indictment, the TRMC including its leaders, members, and associates, constituted an enterprise as defined by Title 18, United States Code, Section 1959(b)(2), that is a group of individuals associated in fact, which was engaged in, and the activities of which affected interstate and foreign commerce. The enterprise constituted an ongoing organization whose leaders, members, and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

32. The above-described TRMC enterprise, through its leaders, members, and associates engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving murder, arson, and extortion in violation of the laws of the State of Ohio, and acts indictable under Title 18, United States Code, Section 1028.

33. On or about March 20, 2024, in the Southern District of Ohio, and elsewhere, defendants **JUAN ANTHONY ROBLES, JOEY ALLAN MARSHALL, BRANDON WHYLEE FISHER, MICHAEL SETH HENRY, and BRENT ALLEN EGLESTON**,


together with others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the TRMC, an enterprise engaged in racketeering activity, did unlawfully and knowingly attempt to assault with a dangerous weapon members of the Kings MC, in violation of Ohio Revised Code Sections 2903.11(A)(2), 2923.02(A), and 2923.03(A)(2).

All in violation of Title 18, United States Code, Section 1959(a)(6).


F O R E M A N

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